

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JOHN BETTENCOURT,  
Plaintiff

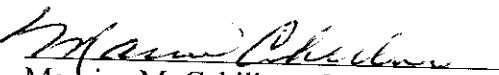
vs.

THE TOP-FLITE GOLF COMPANY,  
Defendant

CIVIL ACTION NO.: 05-30179-MAP

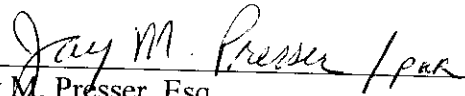
**JOINT STATEMENT**

1. In accordance with Local Rule 16.1, the parties propose the following discovery plan:
  - A. Initial disclosures to be made within fourteen (14) days of the scheduling conference.
  - B. All written discovery and all depositions to be completed within eight (8) months of the scheduling conference.
  - C. All experts are to be disclosed within thirty (30) days after the close of regular discovery and all depositions or experts are to take place within thirty (30) days thereafter.
2. All dispositive motions are to be filed within thirty (30) days of the close of expert discovery with twenty-one (21) days for the response to any such motion.
3. The parties will file their certifications pursuant to L.R. 16.1(D)(3).

  
Maurice M. Cahillane, Esq.  
BBO No. 069660  
Counsel for Plaintiff  
Egan, Flanagan and Cohen, P.C.  
67 Market Street  
Springfield, Massachusetts 01103  
Tel: 413-737-0260; Fax: 413-737-0121

Dated: 9/15/05

12085-05015798000.wpd

  
Jay M. Presser, Esq.  
BBO No. 405760  
Counsel for Defendant  
Skoler, Abbott & Presser, P.C.  
One Monarch Place, Suite 2000  
Springfield, Massachusetts 01144  
Tel: 413-737-4753; Fax: 413-787-1941

Dated: 9/15/05